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[Additional moving parties and counsel listed on signature pages]

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

(SAN FRANCISCO DIVISION)

IN RE: TFT-LCD (FLAT PANEL)  
ANTITRUST LITIGATION

No. 3:07-md-1827 SI  
MDL No. 1827

This Document Relates to Individual Case  
No. 10-cv-4572 SI

**STIPULATION AND [PROPOSED]  
ORDER RE DISCOVERY AND MOTION  
TO COMPEL DEADLINES**

BEST BUY CO., INC., et al.,

Honorable Susan Illston

AU Optronics Corporation, et al.,

## Defendants.

Plaintiffs and the Stipulating Defendants, through the undersigned counsel, request that the Court enter the following stipulated order.

1

**STIPULATION**

2

3 WHEREAS discovery closed in this case on December 8, 2011, as set forth in the  
 4 Stipulation and Order Modifying Pretrial Schedule for “Track One” Direct Action Plaintiff and  
 5 State Attorney General Actions (Dkt. No. 3110, the “Scheduling Order”), and the parties  
 6 previously submitted a stipulation to the Court extending the deadline for Defendants to file  
 7 motions to compel as to certain discovery to January 13, 2012;

8 WHEREAS the Court previously entered a Stipulation and Proposed Order extending the  
 9 close of fact discovery set forth in the Scheduling Order for the limited purpose of extending the  
 10 deadline for Best Buy and certain other Direct Action Plaintiffs in Track One to respond to  
 11 discovery requests served by defendants between October 31 and November 4, 2011, as well as  
 12 negotiating the proper scope of those responses;

13 WHEREAS Best Buy and Stipulating Defendants are currently meeting and conferring  
 14 concerning various issues related to: (1) Best Buy’s responses to the Stipulating Defendants’  
 15 written discovery served by Best Buy on or before December 2, 2011; (2) Best Buy’s production  
 16 of documents and responses to transactional data questions; and (3) the depositions of certain  
 17 Best Buy employees or former employees that Defendants intend to conduct (collectively, “Best  
 18 Buy’s Discovery Responses”).

19 WHEREAS Best Buy and Stipulating Defendants hope to resolve some or all of these  
 20 issues informally, without the need to file motions to compel and seek the Court’s involvement;

21 WHEREAS the current deadline for parties to file motions to compel with respect to Best  
 22 Buy’s Discovery Responses or Defendants’ Discovery Responses is January 13, 2012; and

23 WHEREAS in an effort to facilitate the informal resolution of any disputes, the parties  
 24 wish to extend the deadline for Defendants to file any motions to compel with respect to Best  
 25 Buy’s Discovery Responses through January 27, 2012;

26 NOW, THEREFORE, the Parties, through their undersigned respective counsel, stipulate  
 27 and agree as follows:

28

1. The deadline for the Stipulating Defendants to file any motion to compel with respect to Best Buy's Discovery Responses is extended through and including January 27, 2012.

## IT IS SO STIPULATED.

Dated: January 13, 2012.

## ROBINS KAPLAN MILLER & CIRESI, LLP

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18 AND TATUNG COMPANY OF  
19 AMERICA, INC.

20 Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the  
21 filing of this document has been obtained from the above-referenced counsel.

22 **ORDER**

23 Having considered the foregoing stipulation, and good cause appearing,

24 **IT IS SO ORDERED.**

25 1/18/12

26 Date Entered



27  
28 Judge Susan Illston

**CERTIFICATE OF SERVICE BY E-MAIL**  
(Federal Rules of Civil Procedure Rule 5(b))

I declare that I am employed with the law firm of K&L Gates, LLP, whose address is 925 4<sup>th</sup> Avenue, Suite 2900, Seattle, Washington 98104-1158. I am not a party to the case, and I am over the age of eighteen years.

I further declare that on January 13, 2012, I served a copy of:

**STIPULATION AND [PROPOSED] ORDER RE DISCOVERY AND MOTION  
TO COMPEL DEADLINES**

by electronically mailing a true and correct copy to all parties of record through the CM-ECF system in accordance with Federal Rules of Civil Procedure Rule 5(b).

I declare under penalty of perjury that the above is true and correct.

Executed at Seattle, Washington, this 13th day of January, 2012.

Christopher M. Wyant

/s/ Christopher M. Wyant  
(Signature)